

## OSHA Modifies the Hazard Communication Standard

*OSHA expects to publish the final regulations on the Hazard Communication Standard modifications in August 2011. The impact will be felt by all healthcare providers as OSHA requires modification to all HCS policies and plans, MSDS manuals, chemical labels and mandates employee training requirements to accommodate the changes. Practices will need to update most, if not all, MSDS, redesign all secondary labels and teach employees how to read both.*

### **OSHA has modified the HCS to align with the GHS:**

OSHA published the proposed revisions to the Hazard Communication Standard (HCS) to align with the provisions of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) in 2010 and allowed for a comment period. The GHS system was agreed on at an international level by governments, industry, and labor, and adopted by the UN in 2002 with a goal of 2008 for implementation.

### **While OSHA is a little late in implementation, it appears 2011 will be the year of significant change in this OSHA standard.**

The primary benefit of adopting the GHS is to increase the quality and consistency of information provided to workers, employers and chemical users by adopting a standardized approach to hazard classification, labels and material safety data sheets.

#### **Major proposed changes to the HCS:**

**Hazard classification:** The new standard provides specific criteria for classification of health and physical hazards, as well as classification of mixtures.

**Labels:** Labels will include a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Precautionary statements must also be provided. The standard will ensure the label for a chemical that is corrosive carries the same label as all other corrosive materials.

**Safety Data Sheets:** Will now have a standardized 16-section format and the name changes from Material Safety Data Sheets.

**Information and training:** The proposed HCS will require that workers are trained within two years of the publication of the final rule to facilitate recognition and understanding of the new labels and safety data sheets.

### **TMC has been following the proposed new standards for several years:**

- The proposed OSHA standard was published for comment in September 2009.
- The comment period on the proposed standards ended Dec. 31, 2009.
- The Public Hearings ended April 13, 2010.
- The final regulation is expected August 2011.

### **What does this change mean to healthcare practices?**

Under the current HCS all employers must have a hazard communication program for exposed workers, addressing container labels, safety data sheets and employee training on hazards, including chemicals.

This change will require practices to:

- Update policies related to chemical handling and labeling in the practice.
- Most MSDS will have to be replaced, requiring updates to all MSDS manuals.
- Labels currently used to identify chemicals that have been moved to secondary containers in the office, will need to be redesigned. We will not have the final answer on exactly what will be required until we see the final directives.

- Employee training programs will be required to teach employees how to read the new MSDS, to understand the standard pictures and warning labels and to understand the new policies.

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